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*Attorneys for Plaintiff/Counter-Defendant Allstate Life Insurance Company*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ALLSTATE LIFE INSURANCE COMPANY,

• Plaintiff,

• v.

JEFFREY STILLWELL,  
THERESA FRANCY, and STILLWELL  
FINANCIAL ADVISORS, LLC,

• Defendants.

JEFFREY STILLWELL,

• Counter-Plaintiff,

• v.

ALLSTATE LIFE INSURANCE COMPANY,

• Counter-Defendant.

Civil Action No.:

3:15-cv-08251-AET-TJB

**ALLSTATE LIFE INSURANCE  
COMPANY'S MOTION FOR  
LEAVE TO FILE  
SUPPLEMENTAL EXHIBITS  
UNDER SEAL**

Plaintiff Allstate Life Insurance Company ("ALIC"), pursuant to Local Rule 5.3(c) and the Protective Order (Dkt. 17) entered in this action, moves this Honorable Court to file

Supplemental Exhibits 44, 46, 47, 49, 50, 51, and 55 in support of its Reply in Support of its Statement of Material Facts Not in Dispute, under seal. In support thereof, ALIC states as follows:

This action involves claims against Defendants Jeffrey Stillwell and Theresa Francy, and Stillwell's newly formed company Stillwell Financial Associates, LLC ("SFA") for breach of contract, misappropriation of trade secrets, tortious interference, and unfair competition. Many of the documents produced in discovery in this case in support of ALIC's claims against Defendants contain confidential customer information including contact information and policy information. In addition, other documents were produced by third party Ameriprise Financial Services, LLC ("Ameriprise"), which similarly designated documents confidential pursuant to the Protective Order in this action. This information is not otherwise publicly available and ALIC endeavors to protect the privacy of its customer information. The private interests of ALIC and/or Stillwell's customers would be greatly compromised if this information were publicly filed and available.

Each of the aforementioned exhibits are documents produced either by Stillwell related to the customers he is currently servicing at SFA or documents produced by third party Ameriprise that availed itself of the terms of the Protective Order in this case. Efforts to redact any information and have a less restrictive remedy would relegate the documents to complete redactions and therefore, not useful for purposes of summary judgment. ALIC has not previously requested any order from this Court requesting that these documents be filed under seal. ALIC is not aware of any party objecting to the motion to seal request.

WHEREFORE, Allstate Life Insurance Company respectfully requests this Court grant its motion to seal Supplemental Exhibits 44, 46, 47, 49, 50, 51, and 55 in support of its Reply in Support of its Statement of Material Facts Not in Dispute.

**Dated: April 19, 2019**

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ James S. Yu

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on April 19, 2019, he electronically filed the foregoing **Motion for Leave to File Exhibits Under Seal** with the Clerk of the Court using the ECF system, which will send notification to all counsel of record.

/s/ James S. Yu

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